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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

STANFORD HOSPITAL & CLINICS and
LUCILE PACKARD CHILDREN'S
HOSPITAL,

Petitioners,

vs.

SERVICE EMPLOYEES
INTERNATIONAL UNION, LOCAL 715,

Respondent.

Case No: 5:07-CV-05158-JF

STIPULATED MOTION AND
~~PROPOSED~~ ORDER TO CONTINUE
HEARING ON DISPOSITIVE
MOTIONS AND BRIEFING
SCHEDULE

[LOCAL RULE 6-2, 7-7 & 7-12]

Judge: Hon. Jeremy Fogel

SERVICE EMPLOYEES
INTERNATIONAL UNION, LOCAL 715

Petitioner and Counter-
Respondent,

vs.

STANFORD HOSPITAL & CLINICS and
LUCILE PACKARD CHILDREN'S
HOSPITAL

Respondents and Counter-
Petitioners.

Case No: 5:08-CV-00213-JF

Judge: Hon. Jeremy Fogel

STIPULATED MOTION TO CONTINUE HEARING ON DISPOSITIVE MOTIONS

5:07-CV-05158-JF, 5:08-CV-00213-JF, 5:08-CV-00215-JF; 5:08-CV-00216-JF; 5:08-CV-01726-JF; 5:08-CV-01727-JF

SERVICE EMPLOYEES
INTERNATIONAL UNION, LOCAL 715

Petitioner,

vs.

STANFORD HOSPITAL & CLINICS and
LUCILE PACKARD CHILDREN'S
HOSPITAL

Respondents.

Case No: 5:08-CV-00215-JF

Judge: Hon. Jeremy Fogel

SERVICE EMPLOYEES
INTERNATIONAL UNION, LOCAL 715

Petitioner,

vs.

STANFORD HOSPITAL & CLINICS and
LUCILE PACKARD CHILDREN'S
HOSPITAL

Respondents.

Case No: 5:08-CV-00216-JF

Judge: Hon. Jeremy Fogel

SERVICE EMPLOYEES
INTERNATIONAL UNION, LOCAL 715

Petitioner,

vs.

STANFORD HOSPITAL & CLINICS and
LUCILE PACKARD CHILDREN'S
HOSPITAL

Respondents.

Case No: 5:08-CV-01726-JF

Judge: Hon. Jeremy Fogel

SERVICE EMPLOYEES
INTERNATIONAL UNION, LOCAL 715

Petitioner,

vs.

STANFORD HOSPITAL & CLINICS and
LUCILE PACKARD CHILDREN'S
HOSPITAL

Respondents.

Case No: 5:08-CV-01727-JF

Judge: Hon. Jeremy Fogel

1 Pursuant to Local Rules 6-2, 7-7 and 7-12, the Parties hereby move on a stipulated
2 basis for an order continuing the date of the hearing on dispositive motions in the above-
3 captioned related cases.

4 Due to multiple discovery disputes, the Parties have been unable to complete
5 discovery in these cases. The Hospitals have filed motions to compel in order to resolve
6 these disputes. During a hearing held on September 24, 2008 before Magistrate Judge
7 Seeborg, the Parties were able to reach agreement concerning supplemental document
8 production and deposition of witnesses. However, several outstanding issues remain that
9 require resolution by Magistrate Judge Seeborg. Accordingly, Magistrate Judge Seeborg
10 instructed the Parties to submit proposed orders and arguments, which will be completed
11 on October 1, 2008. An order is expected to issue shortly thereafter. However, because
12 the responses to outstanding document requests cannot be provided until after the order
13 on the motions to compel, and depositions can only occur after the production of
14 documents, there will not be sufficient time to complete discovery before the deadline to
15 file oppositions to dispositive motions on October 10, 2008. It is in the interest of
16 judicial economy to permit the outstanding discovery to be completed prior to the
17 submission of the Parties' opposition and reply briefs. Therefore the Parties agreed at the
18 September 24, 2008 hearing to stipulate to continuance of the dispositive motion hearing
19 of at least thirty (30) days. Magistrate Judge Seeborg indicated that the Court would be
20 favorably disposed to granting such a continuance.

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1 Therefore, the Parties have agreed, and hereby stipulate, that the hearing on
2 dispositive motions in Case Nos. 5:07-CV-05158-JF, 5:08-CV-00213-JF, 5:08-CV-
3 00215-JF; 5:08-CV-00216-JF; 5:08-CV-01726-JF; 5:08-CV-01727-JF should be
4 continued to **Friday, December 5, 2008 at 9:30 AM**. The time for filing any opposition
5 and reply briefs will be based upon the December 5, 2008 hearing date under Local Rule
6 7-3. The parties respectfully request that the Court grant this stipulated motion.

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8 Dated: October 1, 2008

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12 By: Eileen R. Ridley /SPI/
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15 Dated: October 1, 2008

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22 **PURSUANT TO STIPULATION, IT IS SO ORDERED.**

23 Dated: 10/2/08

24
25 By: [Signature]
HON. JEREMY FOGEL
26 JUDGE OF THE UNITED STATES
DISTRICT COURT FOR THE
27 NORTHERN DISTRICT OF
28 CALIFORNIA, SAN JOSE DIVISION